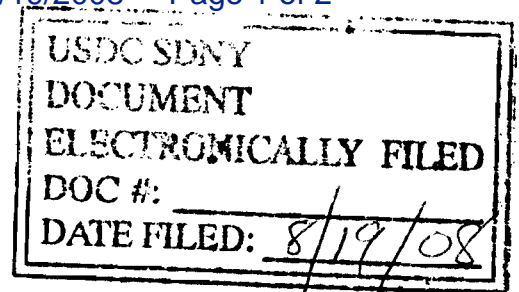


UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

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JOSEPH FIERRO

:

Plaintiff, :

- against - :

City of NY et al. :

Defendant(s). :

-----X

SHIRA A. SCHEINDLIN, U.S.D.J.:

WHEREAS, the Court issued an Order for a Conference in accordance with Fed. R. Civ. P. 16(b) on July 30, 2008 (the "Order"); and

WHEREAS, the Order requires that the parties jointly prepare and sign a proposed scheduling order containing certain information;

NOW, THEREFORE, the parties hereby submit the following information as required by the Order:

(1) the date of the conference and the appearances for the parties;

(2) a concise statement of the issues as they then appear;

Title VII, due process, breach of contract, tortious interference w/ contractual relations

(3) a schedule including:

(a) the names of persons to be deposed and a schedule of planned depositions;

the parties and several non-parties - by 3/30/09

(b) a schedule for the production of documents;

initial disclosures by 9/19/08

interrogatories and document requests by 10/24

responses to interrogatories and document requests - 11/25/08

(c) dates by which (i) each expert's reports will be supplied to the adverse side and

(ii) each expert's deposition will be completed;

experts' reports - 4/13/09 experts' deposition - 5/29/09

(d) time when discovery is to be completed;

5/29/09

(e) the date by which plaintiff will supply its pre-trial order matters to defendant;

7/13/07

(f) the date by which the parties will submit a pre-trial order in a form conforming with the Court's instructions together with trial briefs and either (1) proposed findings of fact and conclusions of law for a non-jury trial, or (2) proposed voir dire questions and proposed jury instructions, for a jury trial; and

8/12/07

(g) a space for the date for a final pre-trial conference pursuant to Fed. R. Civ. P. 16(d), to be filled in by the Court at the conference.

April 6 at 4:30

(leave blank)

(4) a statement of any limitations to be placed on discovery, including any protective or confidentiality orders;

Plaintiff's medical records will be subjected to confidentiality

(5) a statement of those discovery issues, if any, on which counsel, after a good faith effort, were unable to reach an agreement;

(6) anticipated fields of expert testimony, if any;

Plaintiff's experts will be on emotional and psychological injuries and economic damages.

(7) anticipated length of trial and whether to court or jury;

5 days to jury

(8) a statement that the Scheduling Order may be altered or amended only on a showing of good cause not foreseeable at the time of the conference of when justice so requires;

(9) names, addresses, phone numbers and signatures of counsel;

Kathy Polius
Anthony C. Ofodile, Esq. + Kathy A. Polius, Esq., Ofodile + Associates,
P.C., 448 Atlantic Avenue, Brooklyn, NY 11217, 718-852-8300
Jamie Zinaman, 100 Church St Rm 2-111 NY NY 10007 212-788-0887
NYC Law Department - 2

SO ORDERED:

Shira A. Scheindlin
SHIRA A. SCHEINDLIN
U.S.D.J.

8/18/08